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May 14, 2025

**Via ECF**

The Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**Re: *Atlas Data Privacy Corp., et al v. DM Group, Inc., et al.***  
**Civil Action No. 1:24-cv-4075**

**Application for an Extension of Time for Consolidated Reply Brief**

Dear Judge Bartle:

This firm represents defendant DM Group, Inc. in the above-referenced matter along with several other defendants who joined in the Defendants' Consolidated Motion to Dismiss Pursuant to Rule 12(b)(6) filed on March 18, 2025. *See Atlas Data Privacy Corporation, et c. v. DM Group, Inc., et al.*, 1:24-cv-0475-HB, ECF No. 59. We write to respectfully request a one-week extension of time for Defendants to file a consolidated reply brief in further support of the Rule 12(b)(6) motion to dismiss. The extension would move the Defendants' deadline for filing a reply brief from May 27, 2025 to June 3, 2025. We have conferred with Plaintiffs' counsel, and they consent to the request for an extension.

Defendants make this request for a one-week extension of time based on competing deadlines in this case and the Third Circuit interlocutory appeal and an intervening three-day holiday, which is making coordination more difficult. Specifically, Defendants are working on a joint reply brief in the Third Circuit with regard to the interlocutory appeal (which is due on May 30, 2025) and the consolidated reply brief in further support of the Rule 12(b)(6) motion to dismiss in this case, which is currently due on May 27, 2025. Further, the Memorial Day weekend runs from May 24-May 26, 2025.

For these reasons, Defendants respectfully request an extension until June 3, 2025 to file their consolidated reply brief in further support of their Rule 12(b)(6) motion to dismiss.

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Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/ Angelo A. Stio, III  
Angelo A. Stio, III

cc: All counsel of records (via ECF)

SO ORDERED:

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Honorable Harvey Bartle III, U.S.D.J.